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DOCKET FILE COPY ORIGINAL

February 28, 1995

*NEW YORK AND NEW JERSEY BARS ONLY
*NEW YORK BAR ONLY

Ex Parte

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Mail Stop 1170
Washington, D.C. 20036

Re: Revision of the Rules to Ensure Compatibility with Enhanced
911 Emergency Calling Systems, CC Docket No. 94-102

Dear Mr. Caton:

On February 28, 1995, Mr. Louis A. Stilp, TruePosition™ General Manager, The Associated Group, sent the attached letter and its enclosures to the members of the Commission's staff indicated below. The enclosures may be considered relevant to the merits of the referenced proceeding and do contain information not previously placed in the record. Therefore, The Associated Group requests that you place copies of Mr. Stilp's letter and its attachments in the official record of CC Docket No. 94-102.

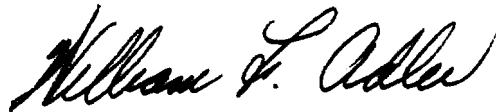
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Mr. William F. Caton
February 28, 1995
Page 2

I am filing two copies of this letter and its attachment in accordance with Section 1.1206(a)(2) of the Commission's rules. Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script, reading "William F. Adler".

William F. Adler

Attachment

CC (w/o attachment):

Regina Keeney
Kathleen Wallman
Robert Pepper
Thomas Stanley
Jane Mago
David Siddall
James Coltharp
Lauren Belvin
Blair Levin
Ruth Milkman
James Keegan
Suzanne Hutchings
Richard Smith
John Reed

THE ASSOCIATED GROUP, INC.

FOR IMMEDIATE RELEASE

Contact:

Patricia Nicolas or Donna Shelton
voice: 404/325-7555
FAX: 404/325-8041

Alexander Communications
CompuServe: 74431,1605

The Associated Group, Inc. Announces Development of TruePosition™
New Cellular Location System will Impact Every Cellular Subscriber

NEW ORLEANS (February 1, 1995) -- The Associated Group, Inc. (NASDAQ: AGRPA, AGRPB) today announced the development and testing of its TruePosition Cellular Location System. TruePosition is an overlay system that is designed to enable wireless carriers to determine the location of any cellular or Personal Communication Service (PCS) telephone within a planned accuracy of 500 feet or less. The system is being developed to support analog and digital formats of cellular and PCS, including the existing base of over 23 million cellular telephones, without any alteration to telephone handsets.

"TruePosition's success is based upon our ability to meet the needs of public safety in support of emergency 911 personnel and to enable cellular carriers to decrease costs through fraud reduction and better system management, as well as increase revenues through new custom services," said Louis A. Stilp, The Associated Group TruePosition General Manager.

The location system uses advanced Time Difference Of Arrival (TDOA) technology to calculate the latitude, longitude, velocity and direction of travel of any designated wireless telephone or transmitter. Upon receipt, the location information will be forwarded in real time for use in a number of compelling applications, including:

- ◆ Support of the Federal Communications Commission's recently proposed rules requiring wireless carriers to provide location information to emergency authorities for callers dialing "911."
- ◆ Ability of cellular carriers to reduce costs associated with cellular fraud by providing the location of perpetrators while unauthorized calls are in progress.
- ◆ Ability of cellular carriers to create incremental calling zones and offer rate plans individually customized by caller location.
- ◆ Ability to track existing fleets of vehicles, such as taxis, trucks and buses, as well as materials and inventories.

--more--

TruePosition is the result of over three years of research and development. A prototype location system was created and demonstrated in the Rochester, New York cellular market during 1993. The Associated Group is currently alpha testing TruePosition in the Philadelphia, Pennsylvania cellular market with the cooperation of Comcast Cellular Communications. Beta testing is planned for the fall of 1995.

The Associated Group has selected Watkins-Johnson Company to participate in the alpha testing by providing custom designed receivers and signal processing subsystems. Watkins-Johnson is an established supplier of advanced electronic subsystems and components to the cellular industry, defense ministries and telecommunications agencies around the world. "Watkins-Johnson's expertise in receiver design and manufacturing enhances our successful development of the technology," added Stilp.

The Associated Group was spun-off from Associated Communications Corporation, which constructed and operated metropolitan cellular telephone systems in upstate New York. These systems were sold to Southwestern Bell Corporation in December 1994. The Associated Group has significant holdings in Tele-Communications, Inc., an equity interest in Portatel del Sureste, S.A. de C.V., the non-wireline cellular system in southeastern Mexico and the Yucatan Peninsula, an equity interest in Mobilcom, S.A. de C.V., a specialized mobile radio operator throughout Mexico, an equity interest in a PCS licensee in New York City and ownership of Associated Communications of Los Angeles, operator of a digital microwave network, as well as radio broadcasting and other interests.

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TruePosition is a trademark of The Associated Group, Inc.



THE ASSOCIATED GROUP, INC.

TruePosition™ Technology Background

TruePosition Cellular Location System is an overlay system that enables wireless carriers to determine the location of any cellular or Personal Communication Service (PCS) telephone within a planned accuracy of 500 feet or less. The system uses advanced Time Difference of Arrival (TDOA) technology, which offers many advantages over alternate location technologies. In addition, TruePosition's use of a telephone's reverse control channel allows the technology to support many wireless applications efficiently and cost effectively.

The TruePosition System Architecture was designed around the installed base of over 23 million analog and digital cellular telephones, as well as planned new standards. The architecture is modular and mirrors existing carrier infrastructure:

- ♦ Wideband digital receivers are added to a subset of existing cell sites.
- ♦ Centrally located digital signal processor executes TDOA algorithms.
- ♦ Application processor interfaces to carrier and end-user applications.
- ♦ User display systems create custom maps and functionality.

The Time Difference of Arrival (TDOA) Algorithms work on the basis of highly precise timing and frequency measurement of a mobile unit's signal as the transmission is received at various cell sites. The centralized processing is technically and economically efficient, offering several benefits:

- ♦ Each site needs a simple antenna vs. complex arrays required for other technologies.
- ♦ Equipment is required at only one-third to two-thirds of existing cell sites.
- ♦ Transmissions can be located outdoors as well as inside buildings.
- ♦ Sophisticated techniques mitigate the effects of urban multi-path.
- ♦ No changes to mobile units are required.

TruePosition's focus on the reverse control channel is a patented technique that appeals to carriers and subscribers. This channel is packet-based, has a short 100 to 150 millisecond duration, and always contains the phone's identification in the message. The choice of this channel for TDOA processing offers many benefits:

- ♦ Monitoring only 21 of 416 cellular channels is highly economical.
- ♦ Control channel is shared by all active, powered on telephones.
- ♦ TruePosition avoids the use of expensive voice channel resources.
- ♦ Use of existing transmissions conserves precious spectrum.
- ♦ Custom, control channel-only transmitters can be built for specific applications.

THE ASSOCIATED GROUP, INC.

TruePosition™ Application Profile

TruePosition Cellular Location System is an overlay system that enables wireless carriers to determine the location of any cellular or Personal Communication Service (PCS) telephone within a planned accuracy of 500 feet or less. The system uses advanced Time Difference of Arrival (TDOA) technology to calculate the latitude, longitude, velocity, and direction of travel for any designated wireless telephone or transmitter.

The location information can then be forwarded in real time for use in these four compelling applications:

- ♦ **Emergency 911 Location** will allow emergency authorities to locate wireless callers dialing "911." Cellular callers represent about 25 percent of all emergency calls placed, yet emergency personnel receive little or no information regarding the identity and location of the callers. This level of service is dramatically lower than that provided via the enhanced 911 databases created for landline callers. The FCC has issued a proposed set of rules in docket 94-102 requiring all wireless carriers to provide location information for all "911" callers.
- ♦ **Fraud Detection and Location** can be used by wireless carriers to reduce losses associated with fraud by identifying the location of fraud perpetrators while unauthorized calls are still in progress. In 1994, losses due to fraud were estimated to cost the cellular industry well over \$1 million per day. Today's solutions are frequently limited to changing the phone number of legitimate customers, or reducing service levels. When effectively used in conjunction with clone detection software, TruePosition can dramatically aid law enforcement authorities in the arrest and prosecution of the perpetrators.
- ♦ **Location Sensitive Billing** empowers wireless carriers to offer new rate plan choices to their customers. Rate plans can be customized for individual users based upon incremental calling zones in addition to the traditional plan type and time of day variables. For example, carriers may offer calling within a customer's home at landline rates (3 to 5 cents per minute), while charging traditional cellular rates when the customer is mobile. Today, over 15% of all phones in the U.S. are wireless, but less than 1% of all minutes of traffic are carried over wireless networks. TruePosition technology will offer carriers the opportunity to increase their share of voice traffic by offering new services to existing subscribers.
- ♦ **Fleet Management** will enable companies to locate their mobile workforce without purchasing or installing new hardware in the vehicles. For example, TruePosition can be used by dispatchers to track the cellular telephones already installed in taxis, trucks, and buses. Application specific transmitters can also be added to other assets such as expensive inventory.

THE ASSOCIATED GROUP, INC.

February 28, 1995

**Ms. Regina Keeney
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 5002 - Mail Stop 2000
Washington, DC 20554**

Dear Ms. Keeney:

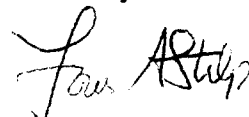
On February 2, 1995, during the Cellular Telecommunications Industry Association's annual convention, The Associated Group, Inc. publicly announced the development and testing of TruePosition™, a versatile new location system for use with cellular or PCS wireless telephone systems. We believe that it will prove the most efficient and reliable technology to respond to the pressing need to locate wireless telephone users in emergencies.

TruePosition uses Time Difference of Arrival technology to calculate the location, speed and direction of travel of any wireless telephone or transmitter. Unlike other technologies, TruePosition does not require a customer to suffer the inconvenience of having his or her telephone modified. Rather, the technology uses the reverse control channel connecting the mobile unit and the transmitters.

Enclosed for your information is a copy of our news release. I would be delighted to provide you with additional written material or to visit with you in Washington to explain how TruePosition works. You are also welcome to visit our test site in Philadelphia.

Please do not hesitate to call me or Associated's special counsel, William F. Adler (202-939-7900) if you have any questions or would like to schedule a meeting.

Sincerely,



Louis A. Stilp

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Enclosure